

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
MAY 20 2025	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY <u>KH</u>	Z DEPUTY

TIMOTHY COURCHAIINE
United States Attorney
District of Arizona

PATRICK E. CHAPMAN
Assistant United States Attorney
Arizona State Bar No. 025407
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, Arizona 85004
Telephone: 602-514-7500
Email: Patrick.Chapman@usdoj.gov
Attorneys for Plaintiff

REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Jakob Vandorn,

Defendant.

No.

CR-25-00776-PHX-DJH (JZB)

INDICTMENT

VIO: 18 U.S.C. §§ 922(o) and 924(a)(2)
(Possession or Transfer of a
Machinegun)
Count 1

18 U.S.C. §§ 922(a)(1)(A), 923(a),
and 924(a)(1)(D)
(Dealing Firearms without a License)
Count 2

18 U.S.C. §§ 924(d) and 981,
21 U.S.C. §§ 853 and 881; and
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

THE GRAND JURY CHARGES:

COUNT 1

On or between August 29, 2024, and April 16, 2025, in the District of Arizona, Defendant, JAKOB VANDORN, did knowingly possess and transfer a machinegun, that is, machinegun conversion devices, parts commonly known as "Glock switches" and "auto sears," which are designed and intended solely and exclusively for use in converting a firearm into a machinegun.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT 2

On or between April 22, 2022, and April 16, 2025, in the District of Arizona, Defendant, JAKOB VANDORN, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

FORFEITURE ALLEGATIONS

The Grand Jury realleges and incorporates the allegations in Counts 1 and 2 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to Title 18, United States Code, Sections 924(d) and 981, Title 21 United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and upon conviction of the offenses alleged in Counts 1 and 2 of this Indictment, the defendant shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense as to which property the defendant is liable. If any forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to, or deposited with, a third party,
- (3) has been placed beyond the jurisdiction of the court,
- (4) has been substantially diminished in value, or
- (5) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

1 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title
2 21 United States Code, Sections 853 and 881, and Title 28, United States Code, Section
3 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

4 A TRUE BILL

5
6 s/
FOREPERSON OF THE GRAND JURY
Date: May 20, 2025

7
8 TIMOTHY COURCHINE
9 United States Attorney
District of Arizona

10
11 s/
PATRICK E. CHAPMAN
12 Assistant U.S. Attorney
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28